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Attorneys for Chapter 7 Trustee  
**RONALD KOTOSHIRODO**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF HAWAII

In re: ) CASE NO. 06-00898  
JAMES WILLIAM LULL, ) (Chapter 7)  
Debtor ) MOTION FOR ORDER  
 ) AUTHORIZING SETTLEMENT  
 ) WITH EDELLE SHER;  
 ) DECLARATION OF RONALD K.  
 ) KOTORSHIRODO  
 )  
 ) HEARING DATE: March 12, 2009  
 ) TIME: 9:30 a.m.  
 ) JUDGE: Honorable Lloyd King

MOTION FOR ORDER AUTHORIZING SETTLEMENT  
WITH EDELLE SHER

Chapter 7 Trustee Ronald K. Kotoshirodo (“Trustee”) of the Estate of the  
above named Debtor JAMES WILLIAM LULL (“Debtor”), moves this Court for

an order pursuant to Rule 9019(a) of the Federal Rules of Bankruptcy Procedure approving a settlement with Edelle Sher (“Sher”).

This Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334. This motion is brought pursuant to Bankruptcy Rules 9013, 9014, 9019(a) and LBR 9013-1(c). In support of this motion, the Trustee respectfully states as follows:

By this motion, the Trustee seeks approval of a compromise settlement with Sher. The Trustee advised Sher of a potential preference claim for \$2,000.00 which the Debtor transferred to Sher within the 90 days before the Debtor’s bankruptcy petition was filed, and which appeared to be on account of the Debtor’s antecedent debt to Sher<sup>1</sup>.

As a result of good faith informal settlement discussions, Sher offered to pay \$1,000.00 to resolve the claim. In view of the amount of the small amount of the underlying claim, and the amount of the proposed compromise versus the likely costs of litigating the matter, the Trustee believes that the compromise is acceptable and in the best interests of the estate. Declaration of Ronald K. Kotoshirodo, attached hereto.

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<sup>1</sup> Sher filed a Proof of Claim on March 19, 2007 for \$1,450,000.00 (unsecured).

Therefore, in order to resolve the matter efficiently without the expense and delay of litigation, the Trustee requests approval to compromise this claim in return for Sher's payment of \$1,000.00.

DATED: Honolulu, Hawaii, JAN 30 2009.

  
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STEPHEN A. JONES  
MICHAEL A. LILLY  
Attorneys for Chapter 7 Trustee

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          ) (Chapter 7)  
JAMES WILLIAM LULL, )  
              )  
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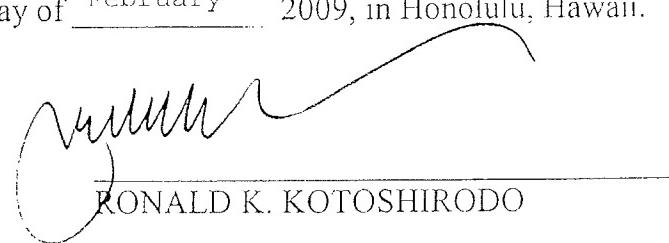
DECLARATION OF RONALD K. KOTOSHIRODO

I, RONALD K. KOTOSHIRODO, hereby declare as follows:

1. I am the duly appointed and acting Trustee of the bankruptcy estate of JAMES WILLIAM LULL, the above-named Debtor.
2. I was appointed as Chapter 7 Trustee in this case by Notice of Appointment of Interim Trustee dated December 12, 2006.
3. I make this declaration in support of my Motion for Order Authorizing Settlement with Edelle Sher (the "Motion").
4. In view of the amount of the small amount of the underlying claim, and the amount of the proposed compromise versus the likely costs of litigating the matter, I believe that the compromise is acceptable and in the best interests of the estate.

I declare under penalty of perjury under the laws of the State of Hawaii and the United States that the foregoing is true and correct.

Executed this 2nd day of February, 2009, in Honolulu, Hawaii.



A handwritten signature in black ink, appearing to read "Ronald K. Kotoshirodo". The signature is fluid and cursive, with a large, sweeping flourish at the end.

RONALD K. KOTOSHIRODO